

From: (b) (7)(C), (b) (6), (b) (7)(D)
To: [Smith, Molly](#)
Cc: [Schulte, Matthew](#); [Kuss, Hala](#)
Subject: Re: Renergy/Emerald Bioenergy/Dovetail Energy LLC/Ohio EPA Investigation - Odor Issues
Date: Monday, June 28, 2021 8:34:56 AM
Attachments: [Dovetail Energy Odor Survey June 17 2021.pdf](#)
[Dovetail Complaints List from OEPA May 11 2021.docx](#)
[Smell My App Data April 2019 - June 13 2021.xlsx](#)
[Emerald Complaint log in OEPA Datadumb.pdf](#)

Ms. Smith

This email will focus strictly on odor issues. The first document is a list of odor complaints I received from Ohio EPA. We knew this wasn't nearly all the odor complaints we have been hearing about. So we told our citizens to start using the Smell My City app on their cell phones. I then downloaded the data and analyzed it on the spreadsheet attached. What we noticed, besides over 900 complaints on odor but that it was most prevalent in the early morning hours or late at night. You can see the accumulated data at the bottom of the spreadsheet. We advised the Ohio EPA what we were seeing but they only do their odor surveys during their working hours.

We trust the Smell My City app due to the technology used. Every entry is marked with GMT and gives longitude and latitude, factors that you can't be falsify.

The 3rd document is Ohio EPA's list of odor complaints at the Emerald Facility in Morrow County. Morrow County is extremely rural and they do not have the number of residents that we do here in Greene County, hence their numbers are lower but the smell is no less diminished. As a matter of fact it's probably worse as they have over 30 million gallons up there, where in Greene County we have 5.5 million gallons.

You'll notice on both of the NPDES I sent you in my first email that these companies are responsible for mitigating odor issues. Even on their odor inspection reports, which I have attached one, the following statement is in the document " *** Nuisance odor" means an emission of any gas, vapor, aerosol or combination thereof from the management of sewage sludge or biosolids, in whatever quantities, that causes, either alone or in reaction with other air contaminants, injurious effects to public health or the environment or unreasonable interference with the comfortable enjoyment of life or property.**

This odor issue is causing not just being able to enjoy our outside property but we've had realtors tell us that incoming military personnel have told them to NOT show them any housing in the Fairborn/Bath Township area, hence it is affecting our economy. Due to Fairborn being located right next to Wright-Patterson Air Force Base, our area gets a fair share of military medically fragile members and/or their spouses and children. We've heard too many storied of medically fragile individuals having to seek medical treatment due to these odors.

Renergy/Emerald/Dovetail and the Ohio EPA also claim it is the hog farm at both locations. I can tell you my husband and I lived right across the street from a hog farm in Indiana and this is 10 times worse than that hog farm on a steaming hot July day. (b) (6), (b) (7)(C), the farmer here in Bath Township has had his hog farm for 20-30 years and no one complained about the smell but when he let the biodigester be built on his land that's when the odors started.

We have done our research and we are not against anaerobic digesters as a whole, but those that do not operate in a responsible and community minded manner. We must all live together on this earth and our community is all for renewable energy and "green" products. Renergy/Emerald/Dovetail claims to be "Green" but the only action we can find that is green regarding these locations is they save the material from going to landfills. But truthfully we're beginning to question weather that wouldn't be a better solution. We have asked the Ohio EPA to provide numerous reporting criteria on what products are being brought into our community and the makeup of what is going out but all parties refuse to do that.

I'll send more tomorrow. Thank you for taking the time to look at our research and if you have any question please let me know.

(b) (6), (b) (7)(C), (b) (7)(D)

-----Original Message-----

From: Smith, Molly <Smith.Molly@epa.gov>

To: (b) (6), (b) (7)(C), (b) (7)(D)

Cc: Schulte, Matthew <Schulte.Matthew@epa.gov>; Kuss, Hala <Kuss.Hala@epa.gov>

Sent: Thu, Jun 3, 2021 5:21 pm

Subject: RE: Emerald Bioenergy

(b) (6), (b) (7)(C), (b) (7)(D) —

Please send any additional information you wish to share with EPA to me at this email address.

Thank you.

Molly Smith
(she/her/hers)
Section 1 Chief
Water Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
(312) 353-8773

Report Environmental Violations: <https://www.epa.gov/enforcement/report-environmental-violation-general-information>

From: (b) (6), (b) (7)(C), (b) (7)(D)

Sent: Thursday, June 3, 2021 3:55 PM

To: Smith, Molly <Smith.Molly@epa.gov>

Cc: Schulte, Matthew <Schulte.Matthew@epa.gov>; Kuss, Hala <Kuss.Hala@epa.gov>;

DiCosmo, Nefertiti <dicosmo.nefertiti@epa.gov>; (b) (6), (b) (7)(C)

Subject: Re: Emerald Bioenergy

Ms. Smith

I understand the Federal EPA not discussing the issue with me but I have additional information that I believe should be reviewed for the investigation. How would you like me to handle that information?

Thank You

(b) (6), (b) (7)(C), (b) (7)(D)

-----Original Message-----

From: Smith, Molly <Smith.Molly@epa.gov>

To: (b) (6), (b) (7)(C), (b) (7)(D)
Cc: Schulte, Matthew <Schulte.Matthew@epa.gov>; Kuss, Hala <Kuss.Hala@epa.gov>; DiCosmo, Nefertiti <dicosmo.nefertiti@epa.gov>; (b) (6), (b) (7)(C)
Sent: Thu, Jun 3, 2021 4:51 pm
Subject: RE: Emerald Bioenergy

(b) (6), (b) (7)(D), (b) (7)(C) —

Thank you for reaching out. Per EPA policy, EPA cannot discuss open investigations. Please refer to - <https://www.epa.gov/enforcement/restrictions-communicating-outside-parties-regarding-enforcement-actions> - if you have any additional questions.

Sincerely,

Molly Smith
(she/her/hers)
Section 1 Chief
Water Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
(312) 353-8773

Report Environmental Violations: <https://www.epa.gov/enforcement/report-environmental-violation-general-information>

From: (b) (6), (b) (7)(C), (b) (7)(D)
Sent: Thursday, June 3, 2021 11:52 AM
To: Smith, Molly <Smith.Molly@epa.gov>
Cc: Schulte, Matthew <Schulte.Matthew@epa.gov>; Kuss, Hala <Kuss.Hala@epa.gov>; DiCosmo, Nefertiti <dicosmo.nefertiti@epa.gov>; (b) (6), (b) (7)(C)
Subject: Re: Emerald Bioenergy

Ms. Smith

Can you please provide the name, emails and phone numbers of the technical inspector and attorney assigned to the Emerald and Dovetail investigation?

Thank You

(b) (7)(C), (b) (6), (b) (7)(D)

-----Original Message-----

From: (b) (6), (b) (7)(C), (b) (7)(D)
To: Smith, Molly <Smith.Molly@epa.gov>
Cc: Schulte, Matthew <Schulte.Matthew@epa.gov>; Kuss, Hala <Kuss.Hala@epa.gov>; DiCosmo, Nefertiti <dicosmo.nefertiti@epa.gov>; (b) (6), (b) (7)(C)
Sent: Sun, May 23, 2021 9:14 pm
Subject: Re: Emerald Bioenergy

Ms Smith

Thank you for reaching out to us. We were starting to lose hope that anyone in the federal government was listening to us.

Last week we uncovered more disturbing facts and actions on both the OEPA and the Emerald and

Dovetail facilities. How would you like me to provide the investigator and/or the attorney all the information we have?

Thanks again for listening to we, the citizens.

(b) (7)(C), (b) (6), (b) (7)(D)

[Sent from the all new AOL app for iOS](#)

On Friday, May 21, 2021, 3:05 PM, Smith, Molly <Smith.Molly@epa.gov> wrote:

(b) (6), (b) (7)(C), (b) (7)(D) —

I have recently received several correspondences you have sent to EPA Region 5, including those to Special Agent (b) (6), (b) (7)(C). I am writing to inform you that the Water Enforcement and Compliance Assurance Branch in EPA Region 5 has been in correspondence with the Ohio Environmental Protection Agency to discuss the compliance status of the Emerald Bioenergy/Dovetail Energy facilities in Morrow and Greene Counties.

EPA Region 5 has opened an investigation and we have assigned both a technical inspector and attorney to the matter.

We appreciate your continued information on this facility. We are focused on ensuring compliance with the Clean Water Act throughout our Region 5 states.

Sincerely,

Molly Smith
(she/her/hers)
Section 1 Chief
Water Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
(312) 353-8773